

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

<p>.....)</p> <p>JAROSLAV HORNOF, et al.)</p> <p style="padding-left: 40px;"><i>Plaintiffs,</i>)</p> <p style="padding-left: 40px;">v.)</p> <p>UNITED STATES OF AMERICA)</p> <p style="padding-left: 40px;"><i>Defendants.</i>)</p> <p>.....)</p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p>CASE NO.: 2:19-cv-00198-JDL</p>
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PLAINTIFFS' MOTION TO CORRECT RECORD

NOW COME plaintiffs, Jaroslav Hornof, Damir Kordic, and Lukas Zak, by and through their counsel, and respectfully move this honorable Court for leave to correct the record by substituting the attached Exhibit E for “Exhibit E” to their Objection to Defendant’s Motion for Summary Judgment. In support of this motion, Plaintiffs state as follows:

1. The parties have offered different interpretations of the term *bona fide crewman* as used in the Immigration Act, 8 U.S.C. § 1282(a).
2. On page 16 of Plaintiffs’ Objection to Defendant’s Motion for Summary Judgment (ECF Doc. 163) at footnote 9, Plaintiffs discussed the legislative history of that section and specifically cited Senate Report No. 1515, which was referenced as being attached to the Objection as Exhibit E.
3. It has come to Plaintiffs’ counsel’s attention that a different document was inadvertently attached to the Objection as Exhibit E and that the relevant pages of the Senate report were omitted.
4. To remedy that inadvertent error, the correct Exhibit E is attached hereto for the Court’s reference.

DATED Portland, Maine this 13th day of October, 2021.

/s/ Edward S. MacColl

Edward S. MacColl

/s/ Marshall J. Tinkle

Marshall J. Tinkle

Attorneys for Plaintiffs

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CERTIFICATE OF SERVICE

I certify that, on the above date, I made due service of the above document by electronically filing the same using the Court's EM/ECF system.

/s/Marshall J. Tinkle